

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>GENTEX CORPORATION,</b>	:	<b>NO.: 2012-CV-2549</b>
	:	<b>(JUDGE BRANN)</b>
<b>Plaintiff,</b>		:
		:
v.		:
		:
		:
<b>RONALD ABBOTT, HELICOPTERHELMET.COM and HELICOPTER HELMET LLC,</b>	:	<b>ELECTRONICALLY FILED</b>
	:	
<b>Defendants.</b>		:
		:
		:

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**DEFENDANT RONALD ABBOTT'S SUPPLEMENT TO DISCOVERY  
MOTIONS (ECF 95-100 AND ECF 115-118) IN VIEW OF GENTEX  
CORPORATION'S OPPOSITION (ECF 119)**

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Ronald Abbott, by undersigned counsel, supplies the following two items that are relevant to arguments made by Gentex Corporation in its Opposition Brief (ECF 119) at (at least) p. 3, n. 4; pp. 11-12; p. 15, n. 11; and p. 18, n. 13:

1. Memorandum and Order by Hon. Kiyo A. Matsumoto, U.S.D.J., in *Gentex Corporation v. Ronald Abbott, et al.*, No. 14-mc-1247 (KAM) (E.D. N.Y. Nov. 21, 2014) (Exh. EE hereto); and
2. Email dated January 28, 2014, by Bruce J. Chasan to Daniel T. Brier and Donna Walsh (Exh. FF hereto). In this email, Abbott calls the Court's

attention to item 3, which states: “We agreed that post-complaint written communications between counsel and their clients need not be listed on a privilege log.” This differs materially from the statement attributed to Attorney Chasan in the fourth sentence of n. 11 in Gentex’s brief.

Respectfully submitted,

LAW OFFICES OF BRUCE J. CHASAN

/s/ Bruce J. Chasan

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Dated: November 21, 2014      *One of the Attorneys for Defendant Ronald Abbott*

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	:	<b>(JUDGE BRANN)</b>
<b>Plaintiff,</b>	:	
	:	
<b>v.</b>	:	
	:	
<b>RONALD ABBOTT,</b>	:	
<b>HELICOPTERHELMET.COM and</b>	:	
<b>HELICOPTER HELMET LLC,</b>	:	
	:	
<b>Defendants.</b>	:	
	:	
	:	

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**CERTIFICATE OF SERVICE**

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This is to certify that I have this 21st day of November, 2014 served a copy of the foregoing **Defendant Ronald Abbott's Supplement to Discovery Motions (ECF 95-100 and ECF 115-118) in View of Gentex Corporation's Opposition (ECF 119)** upon all counsel of record by the Court's ECF filing system:

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/s/ Bruce J. Chasan

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